REMARKS

Claims 1-15 are pending in the present patent application. Claims 1-15 stand rejected.

Claims 1-5 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicants regard as the invention. Specifically, the Examiner asserts that it is unclear what the Applicants mean by "satellite" in claim 1. Applicants respectfully request reconsideration of the rejection of claims 1-5 under 35 U.S.C. §112, second paragraph, in view of the following.

Claim 1 is directed to a server system for a document processing system. Claim 1 recites, in part, a plurality of *satellite servers* connected to said input sources, said satellite servers being configured to receive a plurality of digital files from said input sources; and a *central server connected to said satellite servers*, said central server being configured to receive said digital files from said satellite servers and perform at least one action on at least one of said digital files.

Applicants respectfully submit that the Examiner has taken the term, "satellite", out of context. In claim 1, the term, "satellite", is clearly used in the context of a "satellite server", which is clearly defined in Applicants' specification and is thus definite.

For example, Applicants respectfully direct the Examiner's attention to Applicants' specification from page 4, line 29 to page 5, line 4, which is reproduced below for the convenience of the Examiner:

> *A server may be used as an input source for another server. The input source servers are satellite servers.* There are several possible benefits of this configuration. A single server may become overwhelmed with multiple OptraImage or Image Manager input sources. *Multiple servers can serve the numerous input sources and then send these jobs on to a central server* for actual processing as time permits.

Some action modules may introduce additional cost to the system due to the software required for the action. Having *one centralized server receiving input from multiple satellite servers* allows the costly software to be installed only once, thus reducing overall cost of the system. (Emphasis added).

It is well known that Applicants can be their own lexicographer, and the meanings of words used in the claim are construed in the context of the specification and drawings (MPEP §§2111.01, rev. 2, May 2004, page 2100-50). Applicants' specification clearly defines the term, "satellite servers", as recited in claims 1, 2, and 3, as servers that are connected to and provide input to a "central" server, as recited in claim 1.

Accordingly, Applicants respectfully submit that claims 1-5 are definite and do particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Applicants thus respectfully request the Examiner to withdraw the rejection of claims 1-5 under 35 U.S.C. §112, second paragraph.

Claims 1-5 and 12-15 were rejected under 35 U.S.C. §103(a) as being unpatentable over Rourke, et al. The Examiner did not explicitly provide the patent number of Rourke, et al., but indicated that Rourke, et al. was "cited by applicant". Applicants construe the rejection of claims 1-5 and 12-15 as being in view of Rourke, et al., U.S. Patent No. 5,995, 721, cited by Applicants in an Information Disclosure Statement submitted February 14, 2001. In addition, the Examiner has cited netlingo.com in interpreting the Rourke, et al. term, "clients". Applicants respectfully request reconsideration of the rejection of claims 1-5 and 12-15 in view of the following.

The Examiner attempts to interpret Rourke, et al. in view of Netlingo, but has not supplied Applicants' with any hardcopy documentation of Netlingo, has not listed Netlingo in the Notice of References Cited, and has not otherwise memorialized or placed on record the

Netlingo reference, leaving Applicants' prosecution history file devoid of part of the basis for

the Examiner's rejection. Further, the Examiner has not shown that Netlingo is prior art under

35 U.S.C §102, in that the Examiner has not shown the effective date of Netlingo, much less a

date that renders Netlingo valid as a prior art reference. Accordingly, the current rejection

under 35 U.S.C §103(a) based on Rourke, et al., while also "unofficially" relying on Netlingo

is improper. Therefore, Applicants request that the current rejection with reference to

Netlingo be withdrawn.

Notwithstanding the above, Rourke, et al. is directed to a system which examines the

attributes of a document for the purpose of delivering one or more portions of the document to

one or more of the document processing subsystems on the basis of the examination of the

attributes (col. 1, lines 9-13). A processing system 10 includes a plurality of printers 12-1, 12-

2, 12-3, . . . 12-n for processing print jobs and making prints in accordance with the job

programming instructions for each job printed (col. 6, lines 45-48). Processing system 10

provides print processing for various workstations or clients 15-1, 15-2, 15-3, . . . 15-n, which

may be remote and/or on site, are operatively coupled to printers 12-1, 12-2, 12-3, 12-n

through server 25 (col. 6, lines 60-64). Clients 15-1, 15-2, 15-3, . . . 15-n provide the

electronic documents that are the source of the print jobs and for this purpose individual ones

or all of clients may have a document scanner, disk input, keyboard, fax, etc. for generating

the electronic documents that comprise the job to be printed (col. 7, lines 2-7).

Applicants believe that claims 1-5 and 12-15 patentably define Applicants' invention

over Rourke, et al. for at least the reasons set forth below.

Claim 1 is directed to a server system for a document processing system. Claim 1

recites, in part, a plurality of satellite servers connected to said input sources, said satellite

servers being configured to receive a plurality of digital files from said input sources; and a central server connected to said satellite servers, said central server being configured to receive said digital files from said satellite servers and perform at least one action on at least one of said digital files. Applicants respectfully submit that Rourke, et al. and netlingo.com do not disclose, teach, or suggest the above-recited subject matter of claim 1.

The Examiner acknowledges that Rourke, et al. does "not explicitly teach satellite servers or a central server", but asserts that it would have been obvious to one of ordinary skill in the art at the time of the invention "to be motivated to interpret and/or employ a central server in conjunction with Rourke, et al., since Fig. 1 illustrates one main server to which the clients must connect in order to fulfill their print job requests.

In addition, the Examiner asserts that the Rourke, et al. clients are servers, relying on netlingo.com for interpreting the Rourke, et al. term, "clients", "since Netlingo teaches that *with the advent of powerful individual workstations, most computers can act as both client and server in different situations* (<netlingo.com>)." (Emphasis in original).

MPEP 2143 provides that the Basic Requirements of a Prima Facie Case of Obviousness requires that the prior art reference (or references when combined) must teach or suggest all the claim limitations (MPEP rev. 2, May 2004, page 2100-129, emphasis added). Because the claim 1 limitations, "satellite servers" and "central server", are not taught or suggested by Rourke, et al., as acknowledged by the Examiner, claim 1 is not obvious with respect to Rourke, et al., as provided by MPEP 2143.

Further, in contrast to claim 1, Rourke, et al. discloses a processing system 10 including a plurality of printers 12-1, 12-2, 12-3, . . . 12-n for processing print jobs and making prints in (col. 6, lines 45-47). Processing system 10 provides print processing for

various workstations or clients 15-1, 15-2, 15-3, . . . 15-n that are operatively coupled to printers 12-1, 12-2, 12-3, 12-n through server 25 (col. 6, lines 60-64), and which provide the electronic documents that are the source of the print jobs generated by using a document scanner, disk input, keyboard, or fax, etc. (col. 7, lines 2-7).

Thus, rather than a plurality of *satellite servers* being configured to receive a plurality of digital files from input sources, and a *central server connected to the satellite servers*, the central server being configured to receive the digital files from the satellite servers, Rourke, et al., merely discloses clients that generate print jobs, and are operatively coupled via a server to printers for printing the print the print jobs. Rather than clients 15-1, 15-2, 15-3, . . . 15-n being satellite servers, clients 15-1, 15-2, 15-3, . . . 15-n merely generate to be printed by processing system 10 without performing typical server functions.

Further, notwithstanding the Examiner's improper reliance on Netlingo, Applicants respectfully submit that the definition asserted by the Examiner does not address a "client", but rather, addresses a "client/server". For example, Applicants direct the Examiner to http://www.netlingo.com/lookup.cfm?term=client%2Fserver, wherein the definition for a client/server is provided as set forth below:

> A relationship in which one computer program (the client) requests information from another computer program (the server), whereby the server responds in fulfilling the request. In terms of "client/server architecture," it is the design model for applications running on a network. The bulk of the back end processing, such as performing a physical search of a database, takes place on a server. The front end processing, which involves communicating with the user, is handled by smaller programs distributed to client workstations. In terms of a "client/server network," LAN resources are allocated so that computing power is distributed among the computers in the network, but some shared resources are centralized in a file server. *With the advent of powerful individual workstations, most computers can act as both client and server in different situations*; this is often described as "n-tier computing," where "n" refers to the multiple levels of clients and servers

that exist. For security reasons, the client/server model requires user authentication. (Emphasis added).

In contrast, the Netlingo definition for a "client" clearly does not disclose, teach, or suggest that a "client" is a server. For example, Applicants direct the Examiner to http://www.netlingo.com/lookup.cfm?term=client, wherein the definition for a <u>client</u> is provided as set forth below:

The name for *a computer that can request information*, such as a Web page, from a server. It also performs tasks independently by using its own applications and programs. Your desktop computer or laptop is a client when it is remotely connected to a host. The software that makes this connection possible is a client, as is the browser used by a visitor to a Web site. (emphasis added).

Accordingly, Netlingo does not disclose, teach, or suggest that the Rourke, et al. clients 15-1, 15-2, 15-3, . . . 15-n are servers, but rather, are computers that can request a print job from a server than causes the print job to be performed. For example, Rourke, et al., discloses that the clients provide job tickets 35 to server 25, which forwards the print job to one of the printers 12-1, 12-2, 12-3, 12-n (col. 7, lines 15-22, Fig. 2), which is consistent with the Netlingo definition for "client".

Accordingly, for at least the reasons set forth above, Applicants respectfully submit that Rourke, et al. does not disclose, teach, or suggest the subject matter of claim 1.

Claims 2-5 are believed allowable due to their dependence, directly or indirectly, on otherwise allowable base claim 1. In addition, claims 2-5 further and patentably define the invention over Rourke, et al.

For example, claim 3 is directed to the server system of claim 2, wherein said satellite servers are configured to pass the accumulated jobs to said central server during at least one off-peak time period. Applicants respectfully submit that Rourke, et al. does not disclose,

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teach, or suggest wherein the satellite servers are configured to pass the accumulated jobs to the central server during at least one off-peak time period.

The Examiner acknowledges that Rourke, et al. does not explicitly disclose an off-peak time period, but asserts that it would have been obvious to one of ordinary skill in the art at the time of Applicants' invention. However, MPEP 2143 provides that the Basic Requirements of a *Prima Facie* Case of Obviousness requires that the prior art reference (or references when combined) must teach or suggest all the claim limitations (MPEP rev. 2, May 2004, page 2100-129, emphasis added). Because the claim 3 limitation, "off-peak time period", is not taught or suggested by Rourke, et al., as acknowledged by the Examiner, claim 3 is not obvious with respect to Rourke, et al., as provided by MPEP 2143. Applicants request that prior art be produced to establish that which the Examiner contends is obvious to one of ordinary skill in the art, or withdraw this rejection.

Accordingly, claim 3 is believed allowable in its own right.

Claim 12 is directed to a server system for a document processing system, said server system comprising a server configured to perform a plurality of operations on a single digital file. The Examiner rejected claim 12 "along the same rationale" as claim 1. In rejecting claim 1, the Examiner relied on Rourke, et al. for the proposition that Rourke, et al. suggested "satellite servers" and a "central server", as recited in claim 1. However, claim 12 does not recite either "satellite servers" or a "central server", and hence the rejection of claim 1 has nothing to do with claim 12. Accordingly, the Examiner has not established a prima facie case of obviousness of claim 12 with respect to Rourke, et al. Accordingly, it is requested that this rejection be withdrawn.

Notwithstanding the above, in contrast to a server configured to perform a plurality of operations on a single digital file, Rourke, et al. discloses a processing system 10 that provides print processing for various workstations or clients 15-1, 15-2, 15-3, . . . 15-n that are operatively coupled to printers 12-1, 12-2, 12-3, 12-n through a server 25 (col. 6, lines 60-64). The clients provide job tickets 35 to server 25, which forwards the print job to one of the printers 12-1, 12-2, 12-3, 12-n (col. 7, lines 15-22, Fig. 2). A software implementation allows one or more portions of a job to be processed in one or more queues (col. 9, lines 24-26), whereby different portions of print job may be performed, to be integrated later (Figs. 2, 12). Thus, rather than a server configured to perform a plurality of operations on a single digital file, as recited in claim 12, Rourke, et al. discloses a server that performs a single function on a print job, that is, routing the print job to one or more printers for printing.

Accordingly, Rourke, et al. does not disclose, teach, or suggest a server configured to perform a plurality of operations on a single digital file, as recited in claim 12.

Accordingly, for at least the reasons set forth above, Applicants respectfully submit that Rourke, et al. does not disclose, teach, or suggest the subject matter of claim 12.

Claims 13-15 are believed allowable due to their dependence, directly or indirectly, on otherwise allowable base claim 12.

Accordingly, for at least the reasons set forth above, Applicants respectfully submit that Rourke, et al. does not disclose, teach, or suggest the subject matter of claims 1-5 and 12-15, and thus respectfully request that the rejection of claims 1-5 and 12-15 under 35 U.S.C. 103(a) be withdrawn.

Claims 6-11 were rejected under 35 U.S.C. §103(a) as being unpatentable over Senn, et al., U.S. Patent No. 6,151,610. Applicants respectfully request reconsideration of the rejection of claims 6-11 in view of the following.

Senn, et al. is directed to the representation and manipulation of documents on a display device (col. 1, lines 11-12). The Senn, et al. summary discloses a document management apparatus that has a scripting language that controls documents by setting the attributes of documents, wherein attributes are pieces of data within a document (col. 1, lines 33-35). Documents are stored in a repository (col. 6, line 56). A user may retrieve documents from different repositories (col. 7, lines 17-18). A repository server serves the documents to clients, and includes a search engine and an interface to process search requests (col. 7, lines 37-42). The scripts are used to control the renderer of the document (col. 11, lines 27-40).

Applicants believe that claims 6-11 patentably define Applicants' invention over Senn, et al., for at least the reasons set forth below.

Claim 6 is directed to a method of processing a digital file. Claim 6 recites, in part, building a job object including a plurality of action objects, and performing the action objects on the digital file. Applicants respectfully submit that Senn, et al., does not disclose, teach, or suggest building a job object including a plurality of action objects, and performing the action objects on the digital file. In contrast to claim 6, Senn, et al., merely discloses that attributes of a document are set by scripts (col. 1, lines 33-35), and that the scripts are used to control the renderer of the document (col. 11, lines 27-40).

As acknowledged by the Examiner, Senn, et al. does not teach a job object or an action object. However, the Examiner asserts that it would have been obvious to one of ordinary skill in the art at the time of the invention to "use the invention of Senn, et al., to provide for

building a job object including a plurality of action objects; and performing the action objects on the digital file, since the skilled artisan <u>would interpret</u> *setting the attributes of a document* as a **job object** and the *processes to accomplish it* as a **plurality of action objects**." (Emphasis in original).

However, MPEP 2143 provides that the Basic Requirements of a Prima Facie Case of Obviousness requires that the prior art reference (or references when combined) must teach or suggest all the claim limitations (MPEP rev. 2, May 2004, page 2100-129, emphasis added). Because the claim 6 limitations, "job object" and "action object, are not taught or suggested by Senn, et al., as acknowledged by the Examiner, claim 6 is not obvious with respect to Senn, et al., as provided by MPEP 2143. Applicants request that the Examiner produce prior art to establish that which the Examiner contends would be obvious to one of ordinary skill in the art, or withdraw this rejection.

Further, the prior art must suggest the desirability of the claimed invention (§§2143.01, MPEP rev. 2, May 2004, page 2100-129). The mere fact that Senn, et al can be modified to achieve Applicants' invention does not render Applicants' invention obvious unless the prior art also suggests the desirability of the modification (§§2143.01, MPEP rev. 2, May 2004, page 2100-131). However, the Examiner has not supplied a motivation to modify Senn, et al., nor has the Examiner shown that Senn, et al. suggests the desirability of such a modification. Accordingly, a *prima facie* case of obviousness with respect to Applicants' invention of claim 6 has not been established.

Accordingly, for at least the reasons set forth above, Applicants respectfully submit that Senn, et al. does not disclose, teach, or suggest the subject matter of claim 6.

Claims 7-11, are believed allowable due to their dependence, directly or indirectly, on otherwise allowable base claim 6. In addition, claims 7-11 further and patentably define the invention over Senn, et al.

For example, claim 7 is directed to the method of claim 6, wherein said building step is performed by a parser. Applicants respectfully submit that Senn, et al. does not disclose, teach, or suggest the building step, much less a building step performed by a parser, as recited in claim 7. However, the Examiner asserts otherwise, relying on Senn, et al. at column 3, lines 19-25. It is clear that Senn, et al. at column 3, lines 19-25 provides that the "as an alternative, an identifier process can be designed and used to determine whether the value of an attribute is script, and also what script interpreter is needed to interpret it. The identifier process does not test whether the script can be properly parsed, but upon determining that the value of an attribute is script, chooses which script interpreter to call to interpret the script." (Emphasis added). Here, the relied upon Senn, et al. language is a reference pertaining to parsing in the context of testing whether a script can be properly parsed, but does not even address what steps are performed by the asserted parser.

Further, the relied-upon Senn, et al. material does not even address a building step, much less disclose, teach, or suggest the building step being performed by a parser, as recited in claim 7. Rather, the relied-upon Senn, et al. material merely provides for determining if an attribute is a script, and if so, determining what interpreter to use in interpreting the script. This language has nothing to do with a building step being performed by a parser, and thus does not support the Examiner's position with regard to the rejection of claim 7.

Accordingly, claim 7 is believed allowable in its own right.

Claim 10 is directed to the method of claim 6, wherein said performing step includes assigning said action objects to individual worker threads. Senn, et al. clearly does not disclose, teach, or suggest assigning action objects to individual worker threads, as recited in claim 10. In rejecting claim 10, the Examiner relies on Senn, et al., at column 33, lines 10-14, which is reproduced as follows: "Locals are containers that exist only for the duration of a thread of execution and are local to that thread. Since threads often execute in parallel in the scripting language, it is usually appropriate to use locals to store temporary results within a thread." Applicants' respectfully submit that storing temporary results within a thread, as disclosed by Senn, et al., does not disclose, teach, or suggest assigning action objects to individual worker threads. The asserted Senn, et al. language is merely a reference to storing data in a thread, and has nothing to do with assigning action objects to individual worker threads.

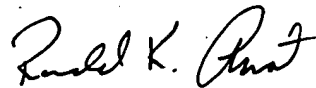Accordingly, claim 10 is believed allowable in its own right.

Accordingly, for at least the reasons set forth above, Applicants respectfully submit that Senn, et al. does not disclose, teach, or suggest the subject matter of claims 6-11, and thus respectfully request that the rejection of claims 6-11 under 35 U.S.C. 103(a) be withdrawn.

For the foregoing reasons, Applicants submit that the pending claims are definite and do particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Moreover, Applicants submit that the cited references do not disclose, teach or suggest the subject matter of the pending claims. The pending claims are therefore in condition for allowance, and Applicants respectfully request withdrawal of all rejections and allowance of the claims.

In the event Applicants have overlooked the need for an extension of time, an additional extension of time, payment of fee, or additional payment of fee, Applicants hereby conditionally petition therefor and authorize that any charges be made to Deposit Account No. 20-0095, TAYLOR & AUST, P.C.

Should any question concerning any of the foregoing arise, the Examiner is invited to telephone the undersigned at (317) 894-0801.
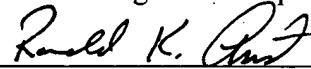
Respectfully submitted,

Ronald K. Aust
Registration No. 36,735

Attorney for Applicant

RKA14/ts

TAYLOR & AUST, P.C.
12029 E. Washington St.
Indianapolis, IN 46229
Telephone: 317-894-0801
Facsimile: 317-894-0803

Enc.: Return postcard